

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

FREE SPEECH COALITION, INC, et. §
al., §
 Plaintiffs, §
 §
v. § Civil Action No. 1:23-cv-00917-DAE
 §
 §
ANGELA COLMENERO, in her §
official capacity as Interim Attorney §
General for the State of Texas, §
 §
 Defendant. §

**DEFENDANT'S UNOPPOSED MOTION FOR LEAVE
TO FILE RESPONSE IN EXCESS OF PAGE LIMIT**

Angela Colmenero, in her official capacity as Provisional Attorney General for the State of Texas, (“Colmenero”) respectfully requests leave of Court to file her response to Plaintiffs’ Motion for Expedited Preliminary Injunction in excess of the 20-page limit.

The excess pages are necessary to adequately present Defendant’s arguments, which respond to claims and arguments contained in both Plaintiffs’ 27-page complaint and 20-page Motion for Preliminary Injunction. Moreover, Defendant’s pleading addresses the claims of four distinct groups of Plaintiffs whose claims and rights vary and require individual responses. Finally, the subject matter of this suit required Defendant to use numerous footnote citations to evidence. These occupy a significant amount of page space. The word count of Defendants’ response is comparable to a normal 20-page pleading.

Defendant used approximately 23½ pages, exclusive of caption, signature, and certificate of service, to put forth her argument and incorporate its evidence. Local Rule CV-7(d)(3) caps a response to a motion at 20-pages.

Plaintiffs' counsel is unopposed to the relief requested in this motion.

Wherefore, Defendant respectfully requests the Court grant this motion and allow the filing of Defendant's Response to Plaintiffs' Motion for Expedited Preliminary Injunction in excess of the page limit for a response to a motion.

Respectfully submitted,

ANGELA COLMENERO
Provisional Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

GRANT DORFMAN
Deputy First Assistant Attorney General

JAMES LLOYD
Interim Deputy Attorney General for Civil Litigation

KIMBERLY GDULA
Deputy Chief, General Litigation Division

RYAN G. KERCHER
Deputy Chief, General Litigation Division



JOHN RAMSEY
Texas Bar No. 24051227

KELSEY L. WARRREN
Texas Bar No. 24095736

Assistant Attorneys General
General Litigation Division
Office of the Attorney General
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 463-2120/Fax (512) 320-0667
john.ramsey@oag.texas.gov
kelsey.warren@oag.texas.gov

COUNSEL FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2023, a true and correct copy of the foregoing document was served via the Court's electronic filing system to all counsel of record.



JOHN RAMSEY
Assistant Attorney General

CERTIFICATE OF CONFERENCE

I certify that on August 18, 2023, I conferred with Plaintiffs' counsel via email regarding the subject of this motion. Counsel indicated that he is unopposed to this motion so long as Defendant does not oppose a commensurate page extension on Plaintiffs' reply.



JOHN RAMSEY
Assistant Attorney General